UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 15 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7677 9418
RETURN RECEIPT REQUESTED

Mr. Michael J. Trivelloni
Operations Manager
V&S Detroit Galvanizing, LLC
12600 Arnold Street
Redford, Michigan 48239

Re: Notice of Violation
Compliance Evaluation Inspection
MID 985 578 988

Dear Mr. Trivelloni:

On March 10, 2015 representatives of the U.S. Environmental Protection Agency and Michigan Department of Environmental Quality (MDEQ) inspected the V&S Detroit Galvanizing, LLC facility located in Redford, Michigan (V&S Detroit Galvanizing). As a large quantity generator of hazardous waste, V&S Detroit Galvanizing is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. (RCRA). The purpose of the inspection was to evaluate V&S Detroit Galvanizing's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by V&S Detroit Galvanizing, EPA's review of records pertaining to V&S Detroit Galvanizing, and the inspector's observations, EPA has determined that V&S Detroit Galvanizing has unlawfully stored hazardous waste without a license or interim status as a result of V&S Detroit Galvanizing's failure to comply with certain conditions for a license exemption under Mich. Admin. Code r. 299.9306(1)-(3) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the license exemption conditions with which V&S Detroit Galvanizing was out of compliance at the time of the inspection in paragraphs 1-4, below.

Finally, EPA has determined that V&S Detroit Galvanizing violated RCRA requirements related to hazardous waste determination and universal waste, as described in paragraphs 5 and 6, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

At the time of the inspection, V&S Detroit Galvanizing was out of compliance with the following large quantity generator license exemption conditions:

1. Hazardous Waste Accumulation

Under Mich. Admin. Code r. 299.9306(1) and (3) [40 C.F.R. § 262.34(a) and (b)], a large quantity generator may accumulate hazardous waste on-site for 90 days or less without a license or interim status unless the generator has been granted an extension of the 90-day period.

At the time of the inspection, V&S Detroit Galvanizing maintained two 55-gallon containers of hazardous "Flux Cake" waste without accumulation dates, see photograph numbers 7 through 10. Based on the records review, the date of the last off-site shipment of Flux Cake (D007/D008) was 3/19/2014.

2. Date When Each Period of Accumulation Begins

Under Mich. Admin. Code r. 299.9306(1)(b) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, V&S Detroit Galvanizing maintained two 55-gallon containers of "Flux Cake" that were not marked with the date upon which each period of accumulation of hazardous waste began, see photograph numbers 7 through 10.

3. Inspection Log

Under Mich. Admin. Code r. 299.9306(1)(a)(i) [40 C.F.R. § 262.34(a)(1)(i)], a large quantity generator must comply with 40 C.F.R. part 265, subparts I, AA, BB, and CC, the generator complies with the containment requirements of 40 C.F.R § 264.175, and the generator documents the inspections required pursuant to 40 C.F.R. § 265.174. Specifically, at least weekly, the owner or operator must inspect areas where containers are stored, see 40 C.F.R. § 265.174. In addition, the owner or operator must record inspections in an inspection log or summary. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions, see 40 C.F.R. § 265.15(d).

At the time of the inspection, V&S Detroit Galvanizing was not keeping a weekly inspection log for those hazardous waste containers in the Chemical Room.

4. Aisle Space

Under Mich. Admin. Code r. 299.9306(1)(d) [40 C.F.R. § 262.34(a)(4)], a large quantity generator must comply with the requirements for owners or operators in Subparts C and D in 40 C.F.R. part 265, with 40 C.F.R. § 265.16, and with 40 C.F.R. § 268.7(a)(5). Specifically, the owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes, see 40 C.F.R. § 265.35.

At the time of the inspection, V&S Detroit Galvanizing did not have sufficient aisle space in the Chemical Room, see photographs number 7 through 10.

Summary: By failing to comply with the conditions for a license exemption, above, V&S Detroit Galvanizing became an operator of a hazardous waste storage facility, and was required to obtain a Michigan hazardous waste storage license. V&S Detroit Galvanizing failed to apply for such a license. V&S Detroit Galvanizing's failure to apply for and obtain a hazardous waste storage license violated the requirements of Mich. Admin. Code r. 299.9502(1), 299.9508 and 299.9510 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

OTHER VIOLATIONS

V&S Detroit Galvanizing violated the following generator requirements:

5. Hazardous Waste Determination

Under Mich. Admin. Code r. 299.9302(1) [40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous.

At the time of the inspection, V&S Detroit Galvanizing had not made a determination whether the used aerosol can puncturing device waste was hazardous, see photograph number 5.

6. Universal Waste Requirements

Under Mich. Admin. Code r. 299.9228(4)(c)(iv), a small quantity handler of universal waste must label the lamp or packaging in which the lamps are contained with the words "Universal Waste Electric Lamps," "Waste Electric Lamps," or "Used Electric Lamps". In addition, Under Mich. Admin. Code r. 299.9228(4)(c)(ii), a small quantity handler of universal waste must manage the lamps in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with the contents of the lamps and will

prevent breakage during normal handling conditions. The packaging must remain closed and lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. Under Mich. Admin. Code r. 299.9228(4)(a), a small quantity handler of universal waste must comply with the requirements of 40 C.F.R. part 273, subpart B, except §§ 273.10 and 273.18(b). Specifically, 40 C.F.R. § 273.18(a) requires a small quantity handler of universal waste is prohibited from sending or taking universal waste to a place other than another universal waste handler, a destination facility, or a foreign destination.

V&S Detroit Galvanizing is a small quantity handler of universal waste because it accumulates less than 5,000 kilograms of universal waste at any time. At the time of the inspection, V&S Detroit Galvanizing's containers of lamps were not labeled with the phrase "Universal Waste Electric Lamps," "Waste Electric Lamps" or "Used Electric Lamps." In addition, some used electric lamps were not in closed containers, see photograph number 6. Also, V&S Detroit Galvanizing personnel could not locate any shipping records for off-site shipments of universal waste electric lamps.

At this time, EPA is not requiring V&S Detroit Galvanizing to apply for a Michigan hazardous waste storage license so long as it immediately establishes compliance with the conditions for a license exemption outlined in paragraphs 1-4, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and waste determination and universal waste requirements. You should submit your response to Walt Francis, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Walt Francis, of my staff, at 312-353-4921or at francis.walt@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Jim Day, MDEQ (dayj@michigan.gov)
John Craig, MDEQ (craigj@michigan.gov)
Lonnie Lee, MDEQ (leel@michigan.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**V&S DETROIT GALVANIZING, LLC**
FACILITY U.S. EPA ID NO.:	**MID 985 578 988**
FACILITY TYPE:	**Large Quantity Generator**
FACILITY ADDRESS:	12600 Arnold Street Redford, Michigan 48239
U.S. EPA REPRESENTATIVE:	Walt Francis
DATE OF INSPECTION:	March 10, 2015
SIC CODE:	3479 – Metal Coating and Allied Services
NAICS CODE:	332812 – Metal Coating, Engraving (Except Jewelry And Silverware), And Allied Services To Manufacturers

PREPARED BY: _____ 4/1/2015
Walt Francis **Date**
Environmental Scientist

APPROVED BY: _____ 4/7/15
Julie Morris, Chief **Date**
Compliance Section 2
RCRA Branch

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the V&S Detroit Galvanizing, LLC (V&S Detroit Galvanizing) facility located at 12600 Arnold Street, Redford, Michigan to determine compliance with the Resource Conservation and Recovery Act (RCRA) and the Michigan Administrative Code (MAC), with respect to V&S Detroit Galvanizing's management of hazardous waste, universal waste and used oil.

Participants

United States Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Michigan Department of Environmental Quality (MDEQ) Inspector –
James Day, Environmental Quality Analyst

Representative of V&S Detroit Galvanizing -
Michael J. Trivelloni, Operations Manager

Site Description/Background Information

Voight & Schweitzer, LLC has galvanizing locations in: Columbus, Ohio; Lebanon, Pennsylvania; New Castle, Delaware; Perth Amboy, New Jersey; Taunton, Massachusetts; Memphis, Tennessee; and Redford, Michigan. The V&S Detroit Galvanizing facility in Redford, Michigan is a "hot dip galvanizing" operation that coats steel fabrications made by various customers with zinc metal to provide enhanced corrosion protection. The galvanizing operation comprises cleaning, pickling and fluxing the steel prior to immersion in a kettle of molten zinc. The galvanized steel parts are then either air cooled or immersed in a water bath (quench). The galvanizing process starts with putting the raw steel material through a series of tanks for the purpose of cleaning the material. The process tanks contain caustics, water rinses, hydrochloric acid, and flux. The caustic cleaning and fluxing tanks operate at 130 to 180° F by heating coils. The water that is in the heating coils is heated via a natural gas-fired boiler. The zinc is kept in a molten state at approximately 835° F via a natural gas furnace. The operating steps include the following: dip the part into heated sodium hydroxide solution to remove any machining oil or grease from the surface; dip the part in heated rinse water to remove any residual caustic; dip the part in hydrochloric acid solution to remove scale; dip the part in heated rinse water to remove any residual acid; dip the part in a heated "fluxing tank" to prepare the surface for zinc coating. Flux is a mixture of ammonium chloride and zinc ammonium chloride in water; dip the part in molten zinc and then drain off any excess zinc; quench the part in either plain water or let the part air-dry. Overhead cranes move the product through the plant and dip the parts into each of the series of large open top tanks. The tanks are 42 feet long by 6 feet wide by 9 feet or 7 feet deep. Surface water from the storage lot drains into a storm water detention basin located on the East side of the property. Additionally, sumps under the kettle basement area pump water to the

storm water detention basin. When the basin is at capacity, water is pumped to the front of the property and into the Redford combined storm/sewer water system. At the time of the inspection, the V&S Detroit Galvanizing was galvanizing metal products. V&S Detroit Galvanizing has approximately 50 employees and operates two shifts. The V&S Detroit Galvanizing Plant has been at this location since 2000. Hazardous wastes are generated in the galvanizing area at the V&S Detroit Galvanizing facility and are taken to a hazardous waste less-than 90 day accumulation area. At the time of the inspection, the V&S Detroit Galvanizing facility was operating as an LQG of hazardous waste, and generates hazardous waste at three satellite accumulation areas (SAAs) and generates hazardous waste when the process tanks are pumped out directly by hazardous waste transporters. Based on information in the MDEQ Waste Data System (WDS), historical hazardous waste streams have included: spent pickle liquor containing hydrochloric acid D002 (corrosive)/D006 (cadmium)/D007 (chromium)/D008 (lead); and flux filter cake D008 (lead). Other wastes include: 1) used fluorescent lamps; 2) used batteries; 3) used rags; 4) used aerosol cans; and 5) used oil. The MDEQ WDS out-bound manifest report indicates that hazardous waste is shipped to US Ecology Michigan, Inc., Detroit, Michigan (MID074259565) approximately one shipment every month.

Opening Conference

U.S. EPA representative Walt Francis and MDEQ representative James Day arrived at the V&S Detroit Galvanizing facility at approximately 8:00 a.m. Inspectors Francis and Day introduced themselves to Mr. Michael J. Trivelloni, Operations Manager. Mr. Trivelloni took the inspectors to his office. The inspectors presented their credentials, and informed Mr. Trivelloni of the nature, scope, and procedures of the inspection. The inspection was conducted by U.S. EPA and MDEQ personnel with U.S. EPA being the lead enforcement agency. Mr. Trivelloni provided the inspectors with a brief overview of the V&S Detroit Galvanizing facility, and provided information on the various hazardous waste, universal waste, used oil, and solid wastes that are generated, and shipped off-site from the V&S Detroit Galvanizing. Specifically, Mr. Trivelloni explained that spent pickle liquor D002/D006/D007/D008, flux filter cake D008, and zinc ash were generated in the galvanizing area. Mr. Trivelloni told the inspectors that Tank Number 4 generates zinc chloride which is shipped off-site as a commodity. In addition, zinc dross is sold for recycling. Mr. Trivelloni told the inspectors that 55-gallon containers of the flux filter cake are accumulated in the Chemical Storage Room. The inspectors reviewed a hazardous waste manifest dated March 21, 2014 for 275 gallons of flux filter cake D006/D008 waste. Inspector Francis asked Mr. Trivelloni about off-site shipments of used oil. Mr. Trivelloni told the inspectors that used oil is generated from forklift maintenance and from tank skimmings. Inspector Francis asked Mr. Trivelloni about used fluorescent lamps. Mr. Trivelloni told the inspectors that the Maintenance Shop accumulates used fluorescent lamps. Inspector Francis asked Mr. Trivelloni about a pond at the rear of the facility. Mr. Trivelloni told the inspectors that the retention pond receives groundwater from sumps at the facility and from surface run-off, and when the pond becomes full, the water is tested and treated with "Accumet" before being pumped to the Redford sewer system. V&S Detroit Galvanizing personnel did not make a Confidential Business Claim on the information gathered during the inspection. Mr. Trivelloni

allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The walk-through began in the main galvanizing area. Mr. Trivelloni showed the inspectors twelve tanks in the production process, which included: two rinse tanks; six hydrochloric acid tanks, a flux tank, a caustic cleaning tank, the molten zinc tank, and a quench tank. Inspector Francis observed a SAA container in this area. Mr. Trivelloni told the inspectors that used oil is collected from tank skimmings and placed in the container. Inspector Francis noted that the container was dated "2/28/15", see photograph number 1. The walk-through continued to the pond outside. Mr. Trivelloni showed the inspectors the pond, see photograph numbers 2 and 3. Mr. Trivelloni told the inspectors that the pond was to be cleaned up in April 2015. The walk-through continued around the outside of the facility and back inside to the hot dip tank. Mr. Trivelloni showed the inspectors how parts are hot dipped. The walk-through continued to the "MZR Machine". Mr. Trivelloni showed the inspectors the MZR machine and an area where containers of recovered zinc are staged, see photograph number 4. The walk-through continued to the Maintenance Shop. Mr. Trivelloni introduced Mr. Mark Cassel to the inspectors. Mr. Cassel showed the inspectors a container of used nickel cadmium batteries. Inspector Francis asked about used aerosol cans. Mr. Cassel showed the inspectors a container with an aerosol can puncturing device near the recovered zinc area, see photograph number 5. The walk-through continued to an area where used lamps are accumulated. Mr. Cassel showed the inspectors an area where four foot and eight foot used fluorescent lamps were accumulated. Inspector Francis observed several 4 foot and 8 foot lamps which were uncontainerized, see photograph number 6. The walk-through continued to the Chemical Storage Room. Mr. Trivelloni showed the inspectors two 55-gallon hazardous waste containers of flux filter cake, see photograph numbers 7, 8, 9, and 10.

The inspection group then returned to Mr. Trivelloni's office to review records.

Records Review

The inspectors reviewed three years of hazardous waste manifest records, waste determination records, contingency plan, and personnel training records. The inspectors reviewed waste determination records. The last off-site shipment of hazardous waste acid was on February 13, 2015. The last off-site shipment of flux filter cake was on March 19, 2014. Mr. Trivelloni could not locate any records of the last universal waste lamp shipment. Mr. Trivelloni had hazardous waste training records for himself from 2013 and 2014. Mr. Trivelloni did not have a hazardous waste area weekly inspection log. Mr. Trivelloni provided the inspectors with an April 18, 2013 version of the Contingency Plan.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. V&S Detroit Galvanizing would

then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, completed inspection checklists and a copy of the photographs taken during the inspection. Inspector Francis discussed the unlabeled aerosol can SAA container, used oil container labeled hazardous waste, and weekly inspection logs. Inspector Day discussed off-site used oil shipments. Inspector Francis provided a U.S. EPA Small Business Resources information sheet, a U.S. EPA Region 5 Pollution Prevention contact sheet, a U.S. EPA Managing Used Oil Advice for Small Businesses fact sheet, and a Michigan Technical Assistance Program information sheet to Mr. Trivelloni.

Attachments
Inspection Checklists.
Photographs.

Department of Environmental Quality
HAZARDOUS WASTE INSPECTION

INSPECTION DATE 3/10/2015 GEN. I.D.# MID985578988 WDS ID# 402775

SITE SPECIFIC NAME V&S Detroit Galvanizing, LLC

SITE LOCATION ADDRESS 12600 Arnold Street

CITY Redford ZIP: 48239 COUNTY Wayne

Reason for Inspection: X CEI ___ FCI ___ FUI ___ CSE ___ CAC ___ COMPLAINT ___ NRR ___ OTHER

WASTE CODE	PROCESS WASTE IS GENERATED FROM
D002/D006/D007/D008	Spent Pickle Liquor
D008	Flux Filter Cake

PERSON(S) INTERVIEWED	TITLE	TELEPHONE NUMBER
Michael Trivellini	Operations Manager	313-535-2600

INSPECTOR'S NAME	AGENCY	TELEPHONE NUMBER
Walt Francis	MICHIGAN DEPT OF ENVIRONMENTAL QUALITY EPA	312-353-4921
Jim Day	MDEQ	586-753-3835

PRIMARY BUSINESS OF FACILITY: Hot dip galvanizing operations.

APPROX./AVG. # OF EMPLOYEES: 50 DAYS/HRS OPERATION 2 SHIFTS

FACILITY SIZE 50,000 sq feet PHOTOS TAKEN X YES ___ NO

CHRONOLOGY OF INSPECTION & AREAS INSPECTED :

1) ___ 4) ___ 7) ___

2) ___ 5) ___ 8) ___

3) ___ 6) ___ 9) ___

SUMMARY OF FINDINGS: (add sketch of site noting Haz Waste locations **OR** _____ copy of site plan provided by site attached)

CHECK FORMS USED	GENERAL CATEGORIES OF FACILITIES
	C E S Q G
	LIW GENERATOR
	SMALL QUANTITY GENERATOR
	SMALL QUANTITY GEN TANK SYSTEM
X	GENERATOR
	GENERATOR TANK SYSTEM
X	SMALL QTY UNIVERSAL WASTE HANDLER
	LARGE QTY UNIVERSAL WASTE HANDLER
X	USED OIL ACTIVITIES
	TRANSPORTER ___ LIW ___ HAZ WST
	WOOD PRESERVER

Does the facility discharge a process wastewater to the local POTW that would otherwise be a RCRA regulated waste? _____no _____ yes (If yes, send copy of this cover sheet to SWQD).

Does Is the facility subject to air emission standards for process vents managing hazardous waste with organic concentrations of at least 10 ppmw? If yes, circle the type of operation(s): DISTILLATION FRACTIONATION THIN-FILM EVAPORATION SOLVENT EXTRACTION AIR OR STREAM STRIPPING (If yes, send a copy of this cover sheet to AQD).

CHECK FORMS USED	GENERAL CATEGORIES OF FACILITIES
	SITE SPECIFIC PERMITTED T S D F
	PERMITTED GENERAL T S D F
	INTERIM GENERAL T S D F
	GENERATOR APPENDIX
	TANK SYSTEM
	PERMITTED SURFACE IMPOUNDMENT
	PERMITTED WASTE PILE
	PERMITTED LAND TREATMENT
	PERMITTED LANDFILL
	MISCELLANEOUS UNITS
	PERMITTED ORGANIC AIR EMISSIONS- PROCESS VENTS
	PERMITTED ORGANIC AIR EMISSIONS- EQUIPMENT LEAKS
	INTERIM GW MONITORING (USE WITH SUBPARTS K,L, M, & N)
	INTERIM SURFACE IMPOUNDMENT
	INTERIM WASTE PILE
	INTERIM LAND TREATMENT
	INTERIM LANDFILL
	INTERIM CHEMICAL, PHYSICAL & BIOLOGICAL TREATMENT
	INTERIM ORGANIC AIR EMISSIONS FROM PROCESS VENTS
	INTERIM ORGANIC AIR EMISSIONS FROM EQUIPMENT LEAKS

INSPECTOR'S SIGNATURE Wark Z ***DATE*** 3/10/2015

Department of Environmental Quality

FULLY REGULATED GENERATOR (FRG) INSPECTION FORM

Facility's Name V&S Detroit Galvanizing, LLC Part 3 Rules

Date 3/10/2015 ID# MID985578988 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
D002/D006/D007/D008	Spent Pickle Liquor	4,000-5,000 gal/[illegible]
D009	Flux Filter Cake	1/2 drum/month

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

WASTE DETERMINATION (Rule 302: 40 CFR 262.11

(NI = Not inspected; N/A = Not applicable)

			YES	NO	
1.	Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)) US Ecology, American	262A	[ ]	X	NI N/A
	a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c)) 2014 analysis	262D	[X]	___	NI N/A
	b) re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	[X]	___	NI N/A
2.	Did generator have written waste analysis plan if treating wastes on-site? (Rule 306)(1)(d):40 CFR 268.7(a)(5))	262C	[ ]	___	NI (N/A)

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

3.	Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	[X]	___	NI N/A

MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

4.	Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	FSS	[X]	___	NI N/A
5.	Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))	262D	[X]	___	NI N/A
6.	Manifests, prepared by the generator according to instructions in appendix of Part 262 contain the following:				
	a) manifest document number (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
	b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
	c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
	d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
	e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
	f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
	g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
	h) generator signature, initial transporter & date of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
7.	Submitted copy of manifests to Director no later than 10 days after month shipment was made? (Rule 304(2)(b))	262B	[X]	___	NI N/A
8.	For out-of-state manifests, if not submitted by designated facility, generator submitted copy of 3rd signature manifest as requested by Director? (Rule 304(2)(c)) Vickery, Ohio	262B	[ ]	(X)	NI N/A
9.	Is the transporter used properly registered &/or permitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	[X]	___	NI N/A

***NOTE**: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).*

10.	Using manifest that has expired? (Rule 304(1)(a) : 40 CFR 262.20)	262B	___	[X]	NI N/A
11.	Reportable exceptions (Rule 308(3): 40 CFR 262.42)(a)(b))				
	a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:				
	b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:				
12.	Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(1)(b):40 CFR 262.27(a))	262B	[X]	___	NI N/A

13.	Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	[X]	___	NI N/A

LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))

		YES	NO
14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))			
a) all listed waste	268A	[X]	NI N/A
b) all characteristic wastes?	268A	[X]	NI N/A

NOTE: *If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))*

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	268A	[X]	NI N/A
OR			
16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	268A	[ ]	NI (N/A)
OR			
17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	268A	[ ]	NI (N/A)
OR			
18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	268A	[ ]	NI N/A
19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)			
a) EPA hazardous waste #?	268A	[ ]	NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	268A	[ ]	NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	268A	[ ]	NI N/A
d) manifest number associated with the shipment?	268A	[ ]	NI N/A
e) waste analysis data, where available?	268A	[ ]	NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	268A	[ ]	NI N/A
UNLESS			
g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	268A	[ ]	X NI N/A
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)	268A	[ ]	X NI N/A
20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3)			
a) if the notice is for shipments that meet the standards does the notice include the certification?	268A	[ ]	NI (N/A)
b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	268A	[ ]	NI (N/A)

NOTE: *An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)*
NOTE: *Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."*

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6)	268A	[X]	NI N/A
22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	268A	[ ]	NI (N/A)
23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8)	268A	[X]	NI N/A

NOTE: *This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.*

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	268A	[X]	NI N/A

TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))	268A	[ ]	NI (N/A)

BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	262D	[X]	NI N/A
27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	262D	[X]	NI N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)		YES NO
28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a):40 CFR262.30))	262C	co.said__obsrvd__ [X] ___ NI N/A
29. Are waste packages marked & labeled per DOT 49 CFR172 concerning hazardous materials (required before shipping waste off- site)?(Rule 305(1)(b)(c): 40 CFR 262.32(a))	262C	co.said__obsrvd__ [X] ___ NI N/A
30. On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	co.said__obsrvd__ [X] ___ NI N/A
31. If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	[X] ___ NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)		
32. If hazardous waste accumulated in containers: (If no, skip to #35)		
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	262C	[ ] (X) NI N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	(NO) NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	[X] ___ NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1) Unless	262C	___ [ ] NI N/A
OR		
e) one of the following apply:		
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	[ ] ___ NI (N/A)
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7):40 CFR 262.34(g))	262C	[ ] ___ NI (N/A)
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8):40 CFR 262.34(h)	262C	[ ] ___ NI (N/A)
iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10):40 CFR 262.34(i))	262C	[ ] ___ NI (N/A)

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	262C	[X] ___ NI N/A
g) are containers compatible with waste in them (265.172)	262C	[X] ___ NI N/A
h) are containers stored closed? (265.173(a))	262C	[X] ___ NI N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b)	262C	X [ ] NI N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)	262C	[X] ___ NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	[X] ___ NI N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	262C	[ ] (X) NI N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))	262C	[ ] X NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	262C	[X] ___ NI N/A
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	___ [ ] NI (N/A)
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	[X] ___ NI N/A

Rule 306(2) & 40 CFR 262.34(c)(1)(I) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation:		
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))	262C	[X] ___ NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	[X] ___ NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii)) A small can present	262C	[ ] X NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	[ ] X NI N/A
e) are container(s) in good condition? (265.171)	262C	[X] ___ NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	[X] ___ NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	[X] ___ NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:		
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	262C	[X] ___ NI N/A
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	[X] ___ NI N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include

a) impervious base free of cracks? (264.175(b)(1)) :	262C	[ ]	NI N/A
b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	[ ]	NI N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	[ ]	NI N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	262C	[ ]	NI N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)5))	262C	[ ]	NI N/A

NOTE: *Closure of Accumulation Area covered under # 53.*

36. If accumulating solids, (other than F020,F021,F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	262C	[X]	NI N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? *Explain any yes answer.*			X NI N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	262C	[X]	NI N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	[X]	NI N/A
40. Is hazardous waste accumulated in tanks? *If so, complete Tank System inspection form.*			X NI N/A
41. Is hazardous waste placed on drip pads? *If so, complete Wood Preserving inspection form*			X NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16
PERSONNEL TRAINING (265.16)

42. Did personnel receive training? (265.16) Mike + Tom Bottorff	262C	[X]	NI N/A
43. Do personnel training records contain the following: Tri Jellum'			
a) job title? (265.16(d)(1))	262C	[X]	NI N/A
b) job descriptions? (265.16(d)(2))	262C	[X]	NI N/A
c) name of employee filling each job? (265.16(d)(1))	262C	[X]	NI N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))	262C	[X]	NI N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3)	262C	[X]	NI N/A
f) records of training? (265.16(d)(4)) 6/26/2014, 12/2/2014	262C	[X]	NI N/A
g) do new personnel receive required training within 6 months? (265.16(b)	262C	[X]	NI N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	262C	[X]	NI N/A
i) training by person trained in hazardous waste management procedures? (265.16(a)) Stanley -	262C	[X]	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.
PREPAREDNESS AND PREVENTION (265.30-265.37)

		co.said_obsrvd_
44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	[X] NI N/A
45. If required, does this facility have the following:		
a) internal communications or alarm systems? (265.32(a))	262C	[X] NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	[X] NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	[X] NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	[X] NI N/A
46. Testing and Maintenance of Emergency Equipment		
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	[X] NI N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable **only** if required (40 CFR 265. 32)		
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	262C	[X] NI N/A
ii) if only one employee on the premises while facility is operating. (265.34(b))	262C	[X] NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	262C	[ ] X NI N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b))	262C	[X] NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.
CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	262C	[X]	NI N/A
49. Does the contingency plan contain the following: 4/18/2013 4/5/2013			
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	262C	[X]	NI N/A

b) describe arrangements w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	262C	[X] ___	NI N/A
c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	262C	[X] ___	NI N/A
d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	262C	[X] ___	NI N/A
e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	262C	[X] ___	NI N/A
50. Does the facility have an Emergency Coordinator? (265.55) Michael Trivellini	262C	[X] ___	NI N/A
Emergency Coordinator and Emergency Procedures:			
a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	262C	[X] ___	NI N/A
b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	262C	[X] ___	NI N/A
c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	262C	[X] ___	NI N/A
d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	262C	[ ] ___	NI (N/A)
51. Contingency plan Amendments and Copies			
a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	262C	[X] ___	NI N/A
b) copies of plan on site and sent to local emergency organizations? (265.53)	262C	[X] ___	NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55

INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

52. Has the facility imported or exported hazardous waste?		___ (X)	NI N/A
a) exporting, has the generator:			
i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	262E	[ ] ___	NI N/A
ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	262E	[ ] ___	NI N/A
iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	262E	[ ] ___	NI N/A
iv) complied with manifest requirements in Rule 309(2)(a-i).	262E	[ ] ___	NI N/A
v) if required, was an exception report filled. (309(3)(a-c))	262E	[ ] ___	NI N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	[ ] ___	NI N/A

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114

ACCUMULATION AREA CLOSURE (265.111 & 265.114)

53. The accumulation area must be closed in a manner that:			
a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	262C	[ ] ___	NI (N/A)
b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or hazardous waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	262C	[ ] ___	NI N/A
c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	262C	[ ] ___	NI N/A

COMMENTS:

Department of Environmental Quality

UNIVERSAL WASTE SMALL QUANTITY HANDLER (SQH) INSPECTION

Facility Name V&S Detroit Galvanizing, LLC Part 2 Rules

Date 3/10/2015 I.D. # MID985578988 1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or more of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations.

(NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)		YES NO
1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B	[ ] [X] NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B	[ ] [X] NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14)

ANTIFREEZE: (Rule 228(4)		QTY HANDLED:
3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	[ ] NI (N/A)
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	[ ] NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). **[USE TANK CHECKLIST]**	273.B	[ ] NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	[ ] NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.B	[ ] NI N/A

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 &273.18(h) requirements)		QTY HANDLED:
8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a)	273.B	[X] NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	[X] NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	[ ] [X] NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI (N/A)
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI (N/A)
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI (N/A)
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	[X] NI N/A

CONSUMER ELECTRONICS: (Rule 228(4)		QTY HANDLED:
13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	[ ] NI (N/A)
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	[ ] NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii)	273.B	[ ] NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse(Rule 228(4)(g)(i); remove other univ. wastes from cons. electronics (Rule 228(4)((g)(ii)); remove modular components for reuse (Rule 228(4)(g)(iii)	273.B	[ ] NI N/A

ELECTRIC LAMPS: (Rule 228(4) ;273.13(c);273.14(d)		QTY HANDLED:
17. Are lamps crushed or broken and facility trying to manage as universal waste? **(universal waste electric lamps shall not be crushed or broken under MI rule)** (Rule 228(4)(c)(i)) ***Note: different from EPA regulation***	273.B	[ ] [X] NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4(c)(ii))	273.B	[ ] [X] NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(s)" or "USED ELECTRIC LAMP(s)". (Rule 228(4)(c)(iv)) ***Note: different from EPA regulation***	273.B	[ ] [X] NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) ***Note: different from EPA regulation***	273.B	[X] [ ] NI N/A
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii (B)) ***Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste***	273.B	[X] [ ] NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	[X] [ ] NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	[X] [ ] NI N/A

MERCURY DEVICES: (Rule 228(4) ; 40 CFR 273.13 & 273.14		QTY HANDLED:
22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	[ ] [ ] NI N/A
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1))	273.B	[ ] [ ] NI N/A
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S) " or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)".(Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	[ ] [ ] NI N/A
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	[ ] [ ] NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	[ ] [ ] NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2) (v))	273.B	[ ] [ ] NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] [ ] NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] [ ] NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	[ ] [ ] NI N/A
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	[ ] [ ] NI N/A
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i))(A&B), 273.13(c)(4)(i)	273.B	[ ] [ ] NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	[ ] [ ] NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	[ ] [ ] NI N/A

PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h)		QTY HANDLED:
28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	[ ] [ ] NI N/A
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	[ ] [ ] NI N/A
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? **[USE TANK CHECKLIST]** (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	[ ] [ ] NI N/A
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	[ ] [ ] NI N/A
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(4)(a): 40 CFR 273.14(b) **[See 273.14(c) if 273.14(b) not possible]**	273.B	[ ] [ ] NI N/A

PHARMACEUTICALS: (Rule 228(4)		QTY HANDLED:
33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	[ ] [ ] NI N/A
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	[ ] [ ] NI N/A

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv)	273.B	[ ] ___ NI N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.B	[ ] ___ NI N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (if no go to question 38) unknown	273.B	[ ] ___ NI N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b)) no records of GST	273.B	[ ] ___ NI N/A
39. Is length of time universal wastes stored documented by one of the following: Satpak		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	[ ] ___ NI N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	[ ] ___ NI N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3)) no record/log	273.B	[ ] ___ NI N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	[ ] ___ NI N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	[ ] ___ NI N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	[ ] ___ NI N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16)) small cases	273.B	[X] ___ NI N/A

RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	[X] ___ NI N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	[X] ___ NI N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	[X] ___ NI N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a)) no record	273.B	[ ] ___ NI N/A
45. If the SQH self-transports waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b)	273.B	[ ] ___ NI N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	[ ] ___ NI N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	[ ] ___ NI N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	[ ] ___ NI N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2)	273.B	[ ] ___ NI N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) **OR**	273.B	[ ] ___ NI N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	[ ] ___ NI N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a)):40 CFR 273.18(g))	273.B	[ ] ___ NI N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	[ ] ___ NI N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	[ ] ___ NI N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	[ ] ___ NI N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	[ ] ___ NI N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

53. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	___ [ ] NI N/A
54. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	___ [ ] NI N/A
55. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ NI N/A
56. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ NI N/A
57. Does transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? ***Shipping papers cannot describe universal waste as "hazardous waste, (l) or (s), n.o.s." nor have waste added to USDOT proper shipping name.*** (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	[ ] ___ NI N/A
58. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	[ ] ___ NI N/A
a. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a)	273.D	[ ] ___ NI N/A
b. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	[ ] ___ NI N/A

COMMENTS:

DEQ

Department of Environmental Quality, Waste and Hazardous Materials Division

USED OIL INSPECTION FORM – GENERATORS

Facility's Name V&S Detroit Galvanizing, LLC Part 8 Rules

Date 3/10/2015 ID# MID985578988 1994 PA 451

Note: *Used oil is defined as "any oil which has been refined from crude oil, or any synthetic oil which has been used and as a result of use, is contaminated with physical or chemical impurities." R 299.9109*

APPLICABILITY (Rule 809)

NI – Not Inspected, N/A – Not Applicable

		YES	NO
1. Does the facility generate used oil and any of the following materials which are subject to regulation as used oil:		X	
a) mixture of used oil and hazardous waste generated by a CESQG regulated pursuant to Rule 205? (Rule 809(1)(a))	UOA		X
b) material that contains or is otherwise contaminated w/ used oil & is burned for energy recovery? (Rule 809(1)(b))	UOA		X
c) used oil that is drained/removed from materials that contain or contaminated w/ used oil? (Rule 809(1)(c))	UOA		X
d) mixture of used oil and fuel? (Rule809(1)(d))	UOA		X
e) material which is produced from used oil & is burned for energy recovery? (Rule 80991)(e))	UOA		X
f) used oil that is burned for energy recovery & any fuel produced from used oil by processing, blending or other treatment & exceeds the following: (Rule 809(1(f))		X	
i) maximum arsenic concentration of 5ppm	UOA		
ii) maximum cadmium concentration of 2ppm	UOA		
iii) maximum chromium concentration of 10ppm	UOA		
iv) maximum lead concentration of 100ppm	UOA		
v) minimum flash point of 100 degrees Fahrenheit	UOA		
vi) maximum total halogen concentration of 4,000ppm	UOA		
g) recycled and a hazardous waste solely because it exhibits a hazardous characteristic? (Rule 809(1)(g))	UOA		X
h) used oil contains PCB's at any concentration of 50ppm or less? (May also be subject to 40 CFR Part 761) (Rule 809(2)(i))	UOA		X
2. Does the facility generate any of the following which exempts it from regulation as used oil: (may be subject to regulation as a hazardous waste)			
a) mixture of used oil and hazardous waste except as specified in Rule 809(1)(a)? (See question 1.a.) (Rule 809(2)(a))	UOA		X
b) used oil including metalworking oils/fluids containing chlorinated paraffin w/ > 1000 ppm total halogens which hasn't been successfully rebutted by demonstrating that it does not contain significant concentrations of halogenated hazardous constituents in 40 CFR Part 261, Appendix VIII? (Rule 809(2)(b))	UOA		
c) metalworking oils/fluids w/ chlorinated paraffin reclaimed through a tolling agreement? (Rule 809(2)(b)(i))	UOA		
d) used oil w/ chlorofluorocarbons from refrigeration units going for reclaim? (Rule809(2)(b)(ii))	UOA		
e) material that contains or is otherwise contaminated w/ used oil from which the oil has been removed?(Rule 809 (2)(c))	UOA		
f) mixture of used oil/diesel fuel that is mixed on used oil generator's site & used in their own vehicles? (Rule 809(2)(d))	UOA		
g) used oil & material derived from used oil that are disposed of or used in a manner constituting disposal? (Rule 809(2)(e))	UOA		
h) used oil re-refining distillation bottoms used as feed stock to manufacture asphalt products? (Rule 809(2)(f))	UOA		
i) wastewater, the discharge of which is subject to §402 or §307(b) of the CWA & is contained w/ de minimis quantities of used oil? (Rule 809((2)(g))	UOA		
j) mixture of used oil/crude or natural gas liquid for insertion into a crude oil pipeline? (Rule 809(2)(h))	UOA		
k) mixture of oil/crude or nature gas liquid w/ less than 1% used oil if being stored/transported to crude oil pipeline or petroleum refinery for insertion into process before crude distillation or catalytic cracking? (Rule 809(2)(i))	UOA		
l) used oil for insertion into petroleum refining process before crude distillation or catalytic cracking w/out prior mixing if used oil constitutes less than 1% of crude oil feed? (Rule 809 (2)(j))	UOA		
m) used oil, unintentionally introduced, is captured by a hydrocarbon recovery system or wastewater treatment system at a petroleum refinery & inserted into the refining process? (Rule 809(2)(l))	UOA		
n) tank bottoms from stock tanks w/mixture of used/crude oil or nature gas liquids? (Rule 809(2)(m)	UOA		
o) used oil produced on vessels from normal shipboard operations while on-ship? (Rule 809(2)(n))	UOA		
p) specification used oil fuel once the facility demonstrates compliance w/ R 299.9815(3)(b),(c)&(f)? (Rule809(2)(o))	UOA		
q) used oil containing polychlorinated biphenyls at 50 ppm or greater? (Rule 809(2)(p))	UOA		

GENERATOR REQUIREMENTS (Rule 810)

NOTE: Used oil generator requirements do not apply to: (1) farmers who generate, in a calendar year, an average of 25gallons per month or less from vehicles or machinery used on the farm, or (2) household do-it-yourselfer

		YES	NO
3. Is the used oil stored in units other than containers or tanks? (Rule 810(4)) FORKLIFT WITH CONTAINER	UOA	[X]	NI N/A
a) in good condition? (40 CFR 279.22(b)(1)) TAKES USED OIL OFF-SITE	UOA	[ ]	NI N/A
b) not leaking (no visible leaks)? (40 CFR 279.22(b)(2))	UOA	[ ]	NI N/A
4. Are all containers & above ground tanks storing used oil labeled/marked "Used Oil"? (40 CFR 279.22(c)(1))	UOA	[ ]	NI N/A
5. Are fill pipes used to transfer used oil into underground tanks labeled/marked "Used Oil"? (40 CFR 279.22(c)(2))	UOA	[ ]	NI N/A
6. Upon detection of a release does the facility:			
a) stop the release? (40 CFR 279.22(d)(1))	UOA	[ ]	NI N/A
b) contain the released used oil? (40 CFR 279.22(d)(2))	UOA	[ ]	NI N/A
c) clean-up and manage the released used oil & other material? (40 CFR 279.22(d)(3))	UOA	[ ]	NI N/A
d) if necessary to prevent future release, repair/replace any leaking oil containers or tanks? (40 CFR 279.22(d)(4))	UOA	[ ]	NI N/A

GENERATOR REQUIREMENTS FOR ON-SITE BURNING IN SPACE HEATER

(Rule 810 refers to 40 CFR 279.23)

7. Does facility that burns used oil in oil-fired space heater(s):			
a) burn only used oil generated by the owner/operator or from household do-it-yourselfers? (40 CFR 279.23(a))	UOA	[ ]	NI N/A
b) burn in heaters designed to have a maximum capacity of not more than 0.5 million BTU per hour?(40 CFR 279.23(b))	UOA	[ ]	NI N/A
c) have combustion gases vented to the ambient air? (40 CFR 279.23(c))	UOA	[ ]	NI N/A

GENERATOR REQUIREMENTS FOR OFF-SITE SHIPMENTS OF USED OIL

(Rule 810 refers to 40 CFR 279.24)

8. Does the facility use a transporter with an EPA identification number? (Rule 810 refers to 40 CFR 279.24) CONTRACT	UOA	[ ]	NI N/A

OR

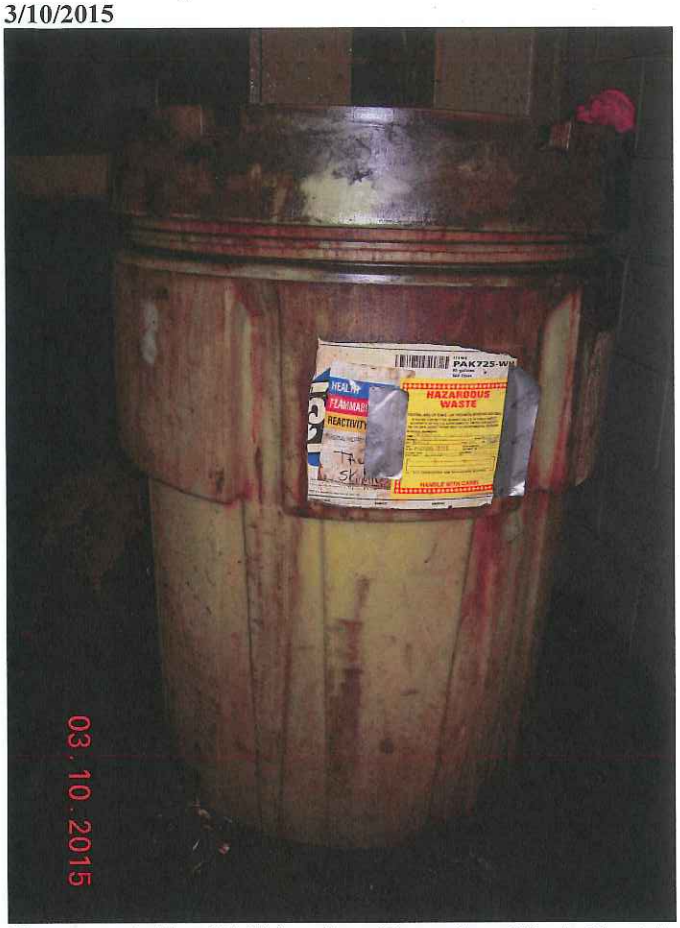
9. If the facility does not use a transporter w/ an EPA identification number, does it meet one of the following exemptions?			
a) self transportation of small amounts to approved collection centers provided that the generator transports:			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(a)(1))	UOA	[ ]	NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(a)(2))	UOA	[ ]	NI N/A
iii) to a used oil collection center that is registered, licensed, permitted or recognized by government? (40 CFR 279.24(a)(3))	UOA	[ ]	NI N/A
b) self transportation of small amounts to aggregation point owned by the generator provided that the generator transports: (40 CFR 279.24(b))			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(b)(1))	UOA	[ ]	NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(b)(2))	UOA	[ ]	NI N/A
iii) the used oil to a used oil aggregation point that is owned/operated by the same generator? (40 CFR 279.24(b)(3))	UOA	[ ]	NI N/A
c) used oil is reclaimed and the processor returns the oil to the generator under tolling for use as lubricant, cutting oil, or coolant? (40 CFR 279.24(c))	UOA	[ ]	NI N/A
i) the contract indicates the type and amount of used oil and frequency? (40 CFR 279.24(c)(10))	UOA	[ ]	NI N/A
ii) the contract indicates the vehicle used to transport both ways is owned by the processor? (40 CFR 279.24(c)(2))	UOA	[ ]	NI N/A
iii) the contract indicates the oil will be returned to the generator? (40 CFR 279.24(c)(3))	UOA	[ ]	NI N/A

USED OIL DISPOSAL (Rule 816)

10. Is used oil that cannot be recycled & is being disposed of & is not a hazardous waste managed in accordance w/ applicable federal & state regulations? (Rule 816(2))	UOA	[ ]	NI N/A
11. Is the used oil used as a dust suppressant? (Rule 816(3))	UOA	[ ]	NI N/A

COMMENTS:-

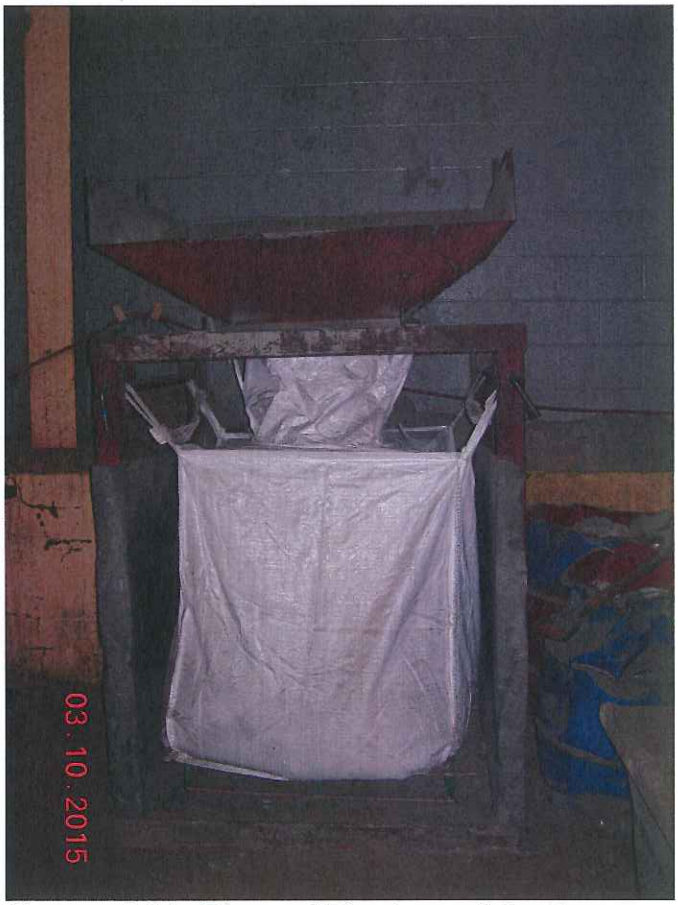
V&S Detroit Galvanizing, LLC
Redford, Michigan
3/10/2015



Photograph #1 – Oil Skimmings Hazardous Waste Container

Photograph #2 – Retention Pond

Photograph #3 – Retention Pond

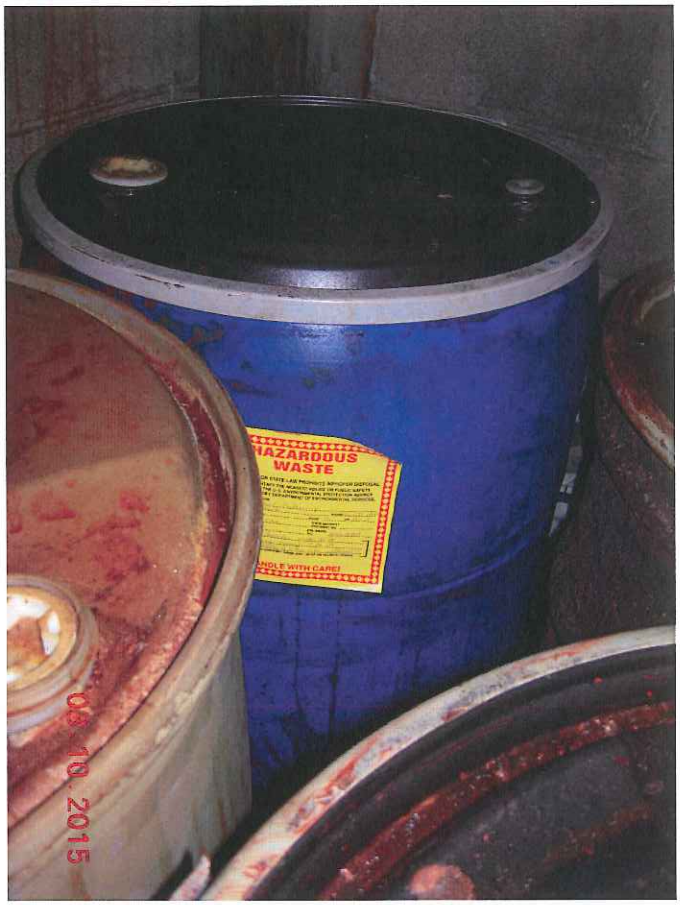


Photograph #4 – Recovered Zinc Accumulation Area

V&S Detroit Galvanizing, LLC
Redford, Michigan
3/10/2015

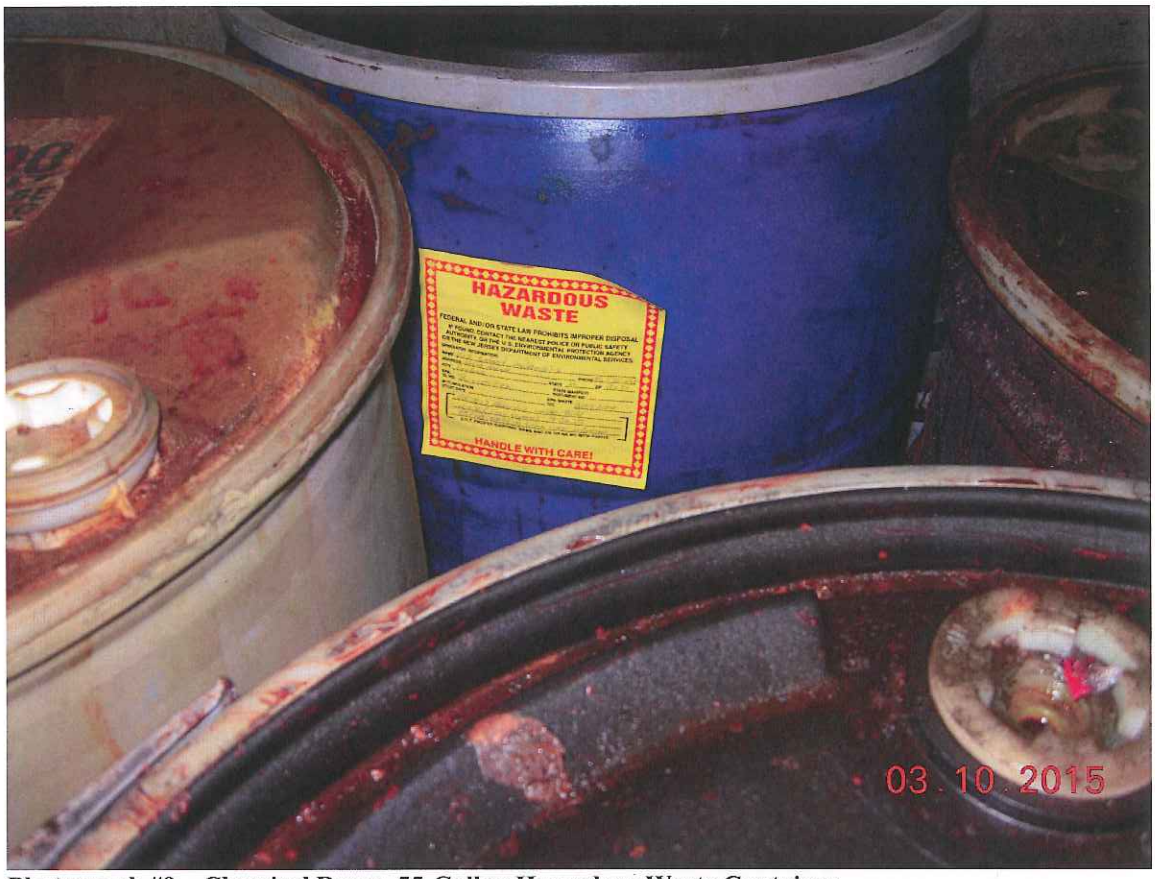
Photograph #5 – Aerosol Can Puncturing Device SAA Hazardous Waste Container

Photograph #6 – Used Fluorescent Lamp Accumulation Area



Photograph #7 – Chemical Room, 55-Gallon Hazardous Waste Container

Photograph #8 – Chemical Room, 55-Gallon Hazardous Waste Container



Photograph #9 – Chemical Room, 55-Gallon Hazardous Waste Container

Photograph #10 – Chemical Room, 55-Gallon Hazardous Waste Container